

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

INSTALLATION SERVICES, INC.	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.: 1:11-cv-3689
	)	
LIBERTY INDUSTRIES, LC d/b/a TOWER	)	Judge: Matthew F. Kennelly
INNOVATIONS, LLC,	)	
	)	Magistrate Judge: Jeffrey T. Gilbert
Defendant.	)	

**MOTION FOR ENTRY OF JUDGMENT**

NOW COMES the Plaintiff, INSTALLATION SERVICES, INC. (hereinafter referred to as “ISI”), by and through its attorneys, DOHERTY & PROGAR LLC, and moves the Court to enter judgment in its favor, and against the Defendant, LIBERTY INDUSTRIES, LC d/b/a TOWER INNOVATIONS (hereinafter referred to as “TI”), pursuant to the attached “Consent Judgment and Non-Execution Agreement” (hereinafter referred to as “Agreement”) and as reasons therefore states as follows:

1. ISI has filed a Complaint against the Defendant, LIBERTY INDUSTRIES, LC d/b/a TOWER INNOVATIONS (TI), seeking the Court to confirm a previous arbitration award in favor of ISI and against TI and to enter judgment thereon.
2. The Defendant, TI, was served with summons on July 26, 2011, but has not appeared by counsel but has been in communication with Plaintiff and Plaintiff’s counsel.

3. In the Agreement attached hereto as Exhibit A, the parties have agreed that judgment can be entered in favor of ISI and against TI in the amount of \$134,146.00. This amount consists of the arbitration award in the amount of \$128,011.00; post-judgment interest \$5,700.00; court filing fee of \$350.00, and; \$85.00 for service of summons. Attached hereto as Exhibits B and C are copies of the receipts for the court filing fee and service of summons.

4. In return for the agreement to the Consent Judgment, the Plaintiff, ISI, has agreed to dismiss this lawsuit *with prejudice* and has agreed to allow TI to pay the judgment in installments. All of these stipulations are contained within the Agreement (See Exhibit A).

WHEREFORE, the Plaintiff, INSTALLATION SERVICES, INC., prays this Court to enter judgment in its favor and against the Defendant, LIBERTY INDUSTRIES, LC d/b/a TOWER INNOVATIONS, LLC in the amount of \$134,146.00, and to dismiss this lawsuit *with prejudice*, for the above-stated reasons.

Respectfully submitted,

INSTALLATION SERVICES, INC.

/s/ Michael T. Sprengnether

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